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10 UNITED STATES DISTRICT COURT

11 NORTHERN DISTRICT OF CALIFORNIA, SAN FRANCISCO DIVISION

12 WAYMO LLC,

CASE NO. 3:17-cv-00939-WHA

13 Plaintiff,

**DECLARATION OF FELIPE
CORREDOR IN SUPPORT OF
DEFENDANTS UBER TECHNOLOGIES,
INC. AND OTTOMOTTO LLC'S
ADMINISTRATIVE MOTION TO FILE
UNDER SEAL EXHIBITS TO THEIR
TRIAL BRIEF**

14 vs.

15 UBER TECHNOLOGIES, INC.;
16 OTTOMOTTO LLC; OTTO TRUCKING
LLC,

17 Defendants.

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1 I, Felipe Corredor, declare as follows:

2 1. I am an attorney licensed to practice in the State of California and am admitted to
 3 practice before this Court. I am an associate at the law firm Quinn Emanuel Urquhart & Sullivan,
 4 LLP, counsel for the Plaintiff Waymo LLC (“Waymo”). I have personal knowledge of the matters set
 5 forth in this Declaration, and if called as a witness I would testify competently to those matters.

6 2. I make this declaration in support of Defendants Uber Technologies, Inc. and
 7 Ottomotto LLC’s Administrative Motion to File Under Seal Exhibits to Their Trial Brief (the
 8 “Administrative Motion”). The Administrative Motion seeks an order sealing the entirety of Exhibits
 9 6-8 to Uber’s Trial Brief.

10 3. The portions of Exhibits 6-8 identified below contain or refer to trade secrets and
 11 confidential business information, which Waymo seeks to seal.

12 4. Exhibit 6 (portions highlighted in green in version filed herewith), Exhibit 7 (entire
 13 document), and Exhibit 8 (portions highlighted in green in version filed herewith) contain, reference,
 14 and/or describe Waymo’s asserted trade secrets or confidential technical information. The
 15 information Waymo seeks to seal includes the confidential design and functionality of Waymo’s
 16 proprietary autonomous vehicle system, including its LiDAR designs and file paths indicating where
 17 those designs are stored, which Waymo maintains as secret. I understand that these trade secrets are
 18 maintained as secret by Waymo (Dkt. 25-47) and that the trade secrets are valuable to Waymo’s
 19 business (Dkt. 25-31). The public disclosure of this information would give Waymo’s competitors
 20 access to descriptions of the functionality or features of Waymo’s autonomous vehicle system. If such
 21 information were made public, I understand that Waymo’s competitive standing would be
 22 significantly harmed.

23 5. Exhibit 6 (portions highlighted in green in version filed herewith) and Exhibit 7 (entire
 24 document) additionally contain, reference, and/or describe Waymo’s highly confidential and sensitive
 25 business information. The information Waymo seeks to seal regards confidential details regarding
 26 Waymo’s business, including details about its financial projections, market analyses, and costs of
 27 materials. I understand that this confidential business information is maintained by Waymo as secret.
 28 The public disclosure of this information would give Waymo’s competitors access to Waymo’s

1 business strategy for its autonomous vehicle system. If such information were made public, I
2 understand that Waymo's competitive standing would be significantly harmed.

3 6. Waymo's request to seal is narrowly tailored to those portions of Exhibits 6-8 that
4 merit sealing.
5

6 I declare under penalty of perjury under the laws of the State of California and the United
7 States of America that the foregoing is true and correct, and that this declaration was executed in San
8 Francisco, California, on November 27, 2017.

9 By /s/ Felipe Corredor
10 Felipe Corredor
11 Attorneys for WAYMO LLC
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13 **ATTESTATION**

14 In accordance with Civil Local Rule 5-1(i)(3), I attest that concurrence in the filing of this
15 document has been obtained from Felipe Corredor.
16

17 By: /s/ Charles K. Verhoeven
18 Charles K. Verhoeven
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